



State of Utah

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**Department of
Workforce Services**

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OSD-SB-002-07

Sidonie Squier, Director
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370 L'Enfant Promenade, S. W.
Washington, DC 20447

Director Squier:

The Utah Department of Workforce Services is pleased to resubmit its TANF Work Verification Plan in according with 45 CFR Part 261.62. We believe our plan will result in accurate reporting of work participation information. We look forward to receiving your comments.

Sincerely,

Tani Pack Downing
Executive Director

cc: Sean Hurley
Terry Perlmutter
Dianne Foss
James Whitaker
Helen Thatcher
Sarah Brenna
Theresa Wheatley
Sherri Kirk



**Department of Workforce Services
Revised Work Verification Plan
February 28, 2007**

Overview

The Department of Workforce Services' (DWS) verification plan was prepared in accordance with the regulatory requirements of the interim final rule that the U.S. Department of Health and Human Service (HHS) published on June 29, 2006. Under the rule, a State must submit its Work Verification Plan to HHS for approval. The plan is organized into five sections: countable work activities, hours engaged in work, work-eligible individuals, internal controls, and verification of other data used in calculating the work participation rates.

The Family Employment Program (FEP) provides financial assistance and employment services to all eligible parents with dependent children residing in their home. The purpose is to empower families to increase their income and become financially independent through employment, child support, and/or disability benefits. Every parent works with a case manager to develop an employment plan that outlines appropriate activities to help the parent meet the goal of financial independence. In order to remain eligible to receive financial assistance, a parent must participate in the activities outlined in the employment plan.

DWS is implementing supervision and documentation requirements November 1, 2006. Initial verification screens have been developed in Utah's Case Management System (UWORKS) and will be available to Employment Counselors on October 1, 2006. In the coming months, DWS will test, evaluate, and modify the new screens to ensure full compliance with regulatory requirements by October 1, 2007.

I. Countable Work Activities

In order to simplify verification procedures for Employment Counselors and customers, DWS has developed a new method of reporting participation hours. The new method is based on twelve reporting cycles with each cycle ending on the last Saturday of a month. If there are any remaining days in the month, they are included in the next reporting cycle. Eight reporting cycles have four weeks; four reporting cycles have five weeks. The week begins on Sunday and ends on the following Saturday.

For each Federal work activity, the number of countable hours of participation is determined by adding the number of verified hours of participation, excused absences and/or holiday hours, and transportation hours (formula provided below) each week. The weekly hours are then totaled and divided by the number of weeks in the reporting cycle.

DWS will include the time it takes to travel to and from Federal work activities. Transportation hours are not entered or determined by Employment Counselors; they are automatically

calculated and added to verified participation hours in the following way:

1. One hour of transportation time is added every week to each Federal work activity that has 1-5 verified hours of participation.
2. Two hours of transportation are added every week to each Federal work activity that has 6-10 verified hours of participation.
3. Three hours of transportation are added every week to each Federal work activity that has 11-15 verified hours of participation.
4. Four hours of transportation are added every week to each Federal work activity that has 16-20 verified hours of participation.
5. Five hours of transportation are added every week to each Federal work activity that has 21+ verified hours of participation.
6. If customers are participating in one Federal work activity but at two different locations on a daily basis, Employment Counselor may, after discussing the situation with customers, agree to add ½ hour of transportation to the verified hours for the second Federal work activity each day customers participate at both locations.

Documentation of transportation hours is implied by the fact customers have verified hours at each activity. The same is true for the additional ½ hour that can be added based on verification that customers attended and have verified hours for both activities in the same day. Once the weekly verified participation hours are totaled, transportation hours are added behind the scenes. Each weekly total within the reporting cycle for each activity is then summed and divided by the number of weeks in the reporting cycle.

DWS' Employment Counselors are responsible for opening the appropriate service in UWORKS based on a negotiated employment plan. Services that comply with Federal work requirements require a planned start date and an actual start date. The planned start date is the date customers are scheduled to begin an activity on their employment plan. The actual start date is the date customers actually begin the activity. Once an actual start date is entered the service populates a verification pop up screen.

The verification pop up is the screen where verified hours are entered by Employment Counselors. The verification screen is based on reporting cycles as explained previously. The screen displays services, service start dates, expected hours, a documentation narration box, and holiday, excused and verified hour fields. Verification hour fields are designated by the week end date and are based on a weekly number of hours. The documentation field corresponds to each verification week field allowing documentation narrations to be entered explaining how hours were verified for the week. Excused and holiday hours are also designated by the week end date and are based on a weekly number of hours. The documentation field corresponds to each excused or holiday hour field allowing documentation narrations to be entered explaining excused or holiday hours. There is an easy access button, which links the user to our imaging system, Content Manager, where documents are imaged and stored electronically. The verification pop up serves as a historical record of verified hours and corresponding documentation.

Hours may also be entered using a mass entry screen in UWORKS. The mass entry screen allows hours to be entered for several customers at the same time. The mass entry screen

contains the same information as the verification pop up.

All participation hours in Federal work activities require supervision and documentation. Supervision is defined as the process of overseeing the performance of a person or group. The person providing the supervision assumes responsibility for the monitoring of activities. Documentation is defined as the items maintained in the case file to confirm compliance with program requirements.

The following UWORKS services and definitions comply with the Federal work activity definitions contained in the interim final rule. Some definitions may appear similar but vary slightly to accommodate customers who are enrolled in other Federal programs, such as the Workforce Investment Act (WIA).

Unsubsidized Employment

Describe the services under this work activity.

Apprenticeship Employment – The paid employment component of an apprenticeship that leads to skilled labor for customers who want to learn a trade. The activity must meet criteria established by the Bureau of Apprenticeship and Training (BAT).

Employment – Full or part-time employment in the public or private sector that pays wages or a salary and is not subsidized by any public program, including TANF.

Self Employment – Activities in which individuals earn income directly from his/her own business, trade or profession, rather than wages or salary from an employer. Activities may include but are not limited to, domestic work, ranching, farming, fishing and the provision of child care. Participation hours equal total gross income minus business expenses divided by the Federal minimum wage.

Youth Employment – Individuals between the ages of 14 and 21 who are in paid employment. Customers must be enrolled in WIA.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours worked in paid employment and transportation hours (based on formula described above) in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Verified participation hours are entered on the verification screen in UWORKS and the documentation is maintained in the electronic case file. Examples of acceptable documentation include: check-stubs, timesheets, payroll records, collateral contacts to

employers, and/or other forms approved by DWS.

For self-employment, describe how the State counts and verifies the hours of participation. A State may not count more hours toward the participation rate for a self-employed individual than the individual's self-employment income (gross income less business expenses) divided by the Federal minimum wage. The State may also describe an alternative methodology to count and verify hours a client is engaged in self-employment.

Participation hours equal total gross income minus business expenses divided by the Federal minimum wage. Documentation for self-employment hours includes tax statements, invoices, receipts, or other documents that verify income or expenses. Documentation does not include customer's self-statement.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projections for employment hours will be based on two weeks of verified participation hours. Employment Counselors will collect documentation for two weeks of paid employment hours and enter those hours on the UWORKS verification screen. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If employment hours are not consistent, Employment Counselors may elect not to use the projection process. In that case, Employment Counselors will enter weekly hours in the weekly hours field on the verification screen.

The UWORKS verification screen will also project Self-Employment hours. Once verified gross income and business expenses are entered into the system by Employment Counselors, UWORKS will calculate monthly hours by dividing total gross income minus business expenses by the Federal minimum wage. Monthly hours are calculated as weekly hours by dividing total monthly hours by the number of weeks in the reporting cycle. UWORKS will project six months of hours based on the formula. When DWS becomes aware of a change to gross income and/or business expenses, new documentation will be collected and hours re-projected based on the most current information.

Subsidized Employment Private Sector

Describe the services under this work activity.

Subsidized Employment – Private – Employment for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing a customers. Customers are paid wages and receive the same benefits as other employees who perform similar work.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours worked in subsidized private employment and transportation hours (based on formula described above) in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: check-stubs, timesheets, payroll records, collateral contacts to employers, and other forms provided by DWS.

Subsidized Employment – Public

Describe the services under this work activity.

Subsidized Employment – Public Sector – Employment for which the employer receives a subsidy from TANF or other public funds to offset some or all of the wages and costs of employing customers. Customers are paid wages and receive the same benefits as other employees who perform similar work.

Work Study – Paid employment for undergraduates and graduate students with financial need. Work Study placements are sites developed or contracted out by educational institutions where students who qualify for this benefit are placed to work in order to receive a stipend. The stipend is usually received as an hourly salary that cannot exceed the total Work Study award.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours worked in subsidized public employment and transportation hours (based on formula described above) in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: check-stubs, timesheets, payroll records, collateral contacts to employers, and other forms

provided by DWS.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projections for work-study hours will be based on two weeks of verified participation hours. Employment Counselors will collect documentation for two weeks of paid employment hours and enter those hours into the UWORKS verification screen. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If work-study hours are not consistent, Employment Counselors may elect not to use the projection process. In that case, Employment Counselors will enter weekly hours in the weekly hours field on the verification screen.

Work Experience

Describe the services or programs the State includes under the activity.

Unpaid Internship – Unpaid Internships are used to train customers in occupational skills. It is also allowable to train certain work habit skills, but these skills are not the focus of Unpaid Internships. Work habit skills include, but are not limited to regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations, and effective task completion. Customers may be placed with a private for profit or non-profit employer, or a public agency. Unpaid Internships are exempt from FLSA minimum wage regulations because they meet the following conditions: Training is similar to that given in a vocational school and includes occupational skills, the main benefit of the unpaid internship is for customers rather than the employer, there is no monetary compensation paid to customers by the participating employer, customers cannot displace regular employees, and the employer is not required to retain customers who successfully complete the unpaid internship.

Youth Unpaid Internship/Work Site Learning – The purpose of Youth Unpaid Internships is career exploration and attainment of work readiness skills. Work readiness/work habit skills, include but are not limited to, regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations, and effective task completion. Three months is generally sufficient for interns to acquire these skills. FLSA minimum wage regulations do not apply according to Department of Labor guidance. Customers must be enrolled in WIA.

Externships – Externships are experiential learning opportunities offered by educational institutions to give students practical experience in their field of study. Externships are a required component of curriculum. Examples of externships include but are not limited to: student teaching, nursing clinicals, cosmetology externships, dental assisting externships, etc. Externships are exempt from FLSA minimum wage regulations because

they meet the following conditions: Training is similar to that given in a vocational school and includes occupational skills, the main benefit of the externship is for customers rather than the employer, there is no monetary compensation paid to customers by the participating employer, customers cannot displace regular employees, and the employer is not required to retain customers who successfully complete the externship.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in the work experience activity and transportation hours (based on formula described above) in a reporting cycle. Excused days and holidays may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: DWS approved forms for attendance and evaluation.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be documented by the Worksite Supervisor using DWS approved attendance and evaluation forms. The customer and supervisor sign the approved form before it is collected for verification purposes.

Community Service

Describe the services or programs the State includes under the activity.

Community Service Internships – Community Service Internships are for customers who are not otherwise able to obtain employment. The emphasis is on improving employability and good work habits. Good work habits include, but are not limited to: regular attendance, consistent punctuality, positive attitude and behavior, appropriate appearance, good interpersonal relations and effective task completion. The main purpose of Community Service Internships is for the direct benefit of the community, rather than customers. FLSA requirements apply.

This service must have a useful purpose for the community and include structured activities. Examples of activities include:

- a. Serving as a teacher's aide at a local school
- b. Helping as a parent volunteer at Head Start
- c. Preparing meals for the needy at a food bank
- d. Providing clerical support for a government agency

- e. Participating in volunteer organizations such as Americorp
- f. Grounds keeping at a local hospital
- g. Working with seniors at a senior citizen center

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in the community service activity and transportation hours (based on formula described above) in a reporting cycle. Excused days and holidays may also be added.

Customers placed on Community Service Internships are subject to FLSA minimum wage regulations. Customers cannot participate for more hours than the monthly TANF grant amount plus the monthly food stamp amount divided by the Federal minimum wage. UWORKS will calculate the maximum number of hours allowable for each customer assigned to this service.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Attendance will be documented using a DWS approved attendance form.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be documented by the Community Service Worksite Supervisor using approved attendance and evaluation forms. The customer and supervisor sign the approved form before it is collected for verification purposes.

Describe how the types of community service positions that create an employer/employee relationship and are subject to FLSA minimum wage requirements will be determined.

All Community Service Internships are subject to FLSA.

If the State permits self-initiated community service positions, describe how it determines that the position provides a direct community service and improves the recipient's employability.

Utah does not permit self-initiated Community Service Internships.

On-the-Job Training

Describe the services or programs the State includes under the activity.

On the Job Training (OJT) – This service is for customers who are job ready and need the

same career training that is given to a paid employee while he or she is engaged in productive work. OJT placements may be in the public or private sector. Customers enrolled in OJT have identified an occupational area for which immediate employment is a realistic goal, have an interest in that occupation, and the aptitude to complete the training as determined by an assessment process. The length of the OJT is determined by the time needed to learn the necessary skills, but is limited to six months. An OJT is not allowed for jobs that are intermittent, temporary, seasonal, or that pay only commission, or piece rate. The employer is reimbursed no more than 50% of the wage paid to customers. OJT is different than subsidized employment in that it is used for job ready customers who need career training.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours worked in the OJT activity and transportation hours (based on formula described above) in a reporting cycle.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: check-stubs, timesheets, payroll records, collateral contacts to employers, and other forms provided by DWS.

If the State intends to project forward hours of participation based on current, documented, actual hours, explain how it will make this projection.

Projections for OJT will be based on two weeks of verified participation hours. Employment Counselors will collect documentation for two weeks of OJT hours and enter those hours on the UWORKS verification screen. Once this information is entered, UWORKS will average the hours and project that average number forward for a period of six months. When DWS becomes aware of a change that is representative of continuing circumstances, new documentation will be collected and hours re-projected based on the most current information.

If OJT hours are not consistent, Employment Counselors may elect not to use the projection process. In that case, Employment Counselors will enter weekly hours in the weekly hours field on the verification screen.

Job Search and Job Readiness

Describe the services or programs the State includes under the activity.

Intensive Employment Services – Customers participating with an agency and/or a job coach that provides employment barrier resolution followed by intensively supported

employment. While enrolled in this service, customers participate in job readiness activities leading to employment.

Choose to Work Expanded Services – Individuals with disabilities receiving intensive job development services.

Individual Job Search – Participation in intensive, individual job search. Job search activities include interviewing, researching employers, updating resumes, preparing applications, scheduling and attending informational interviews, as well as completing online applications, etc.

Job Readiness/ Connection Activities – The use of services available in DWS' Job Connection Area such as: self-directed job search, Electronic Job Board, and Labor Market Information. This can also include the use of career exploration tools such as WinWay Resume, Choices, and career counseling.

Mental Health Treatment-Job Readiness – Resolving job readiness issues by attending counseling sessions, participating in day treatment, taking medications, etc.

Physical Treatment-Job Readiness – Resolving job readiness issues by participating in activities related to treatment of a medical condition. This includes physical therapy, attending appointments, etc.

Substance Abuse Treatment-Job Readiness – Resolving job readiness issues by participating in activities related to resolving drug, alcohol or substance abuse barriers. Customers must be otherwise employable, and the need for this service must be based on documentation from a medical professional.

Pre/Post-Employment Training Workshops – Participation in structured workshops dealing with resume writing, interviewing and interpersonal relationships in the workplace, as well as employer expectations regarding dress, grooming, ethics, responsibility, etc.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in each job search/job readiness activity and transportation hours (based on formula described above) in a reporting cycle. Excused hours and holiday hours may also be included.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation of daily hours every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is

maintained in the electronic case file.

Examples of acceptable documentation for the services of Intensive Employment Services, Choose to Work Expanded Services, Individual Job Search, Job Readiness and Pre/Post Employment Training Workshops, includes: job logs, attendance forms, and UWORKS narrations.

For the services of Mental Health Treatment-Job Readiness, Physical Treatment-Job Readiness and Substance Abuse-Job Readiness acceptable documentation includes: attendance records, collateral contact with the service provider, or other forms approved by DWS.

Describe the methods of daily supervision for each unpaid work activity.

Supervision includes daily responsibility for oversight of customers' participation, although this does not necessarily mean that there will be daily contact with customers. Daily supervision of customers may include access to any of the supervisors listed below. These supervisors are available to customers so they can report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between supervisors and customers must be no less frequently than weekly. Supervision may be provided by DWS staff, contract providers, partner agency staff, workshop instructors, and treatment service providers.

If the State intends to count substance abuse treatment, mental health treatment and rehabilitation activities, describe the criteria to determine whether recipients are "otherwise employable" and establish the necessity of treatment or therapy.

DWS conducts an assessment to determine the appropriate level participation for every customer. In conjunction with this assessment, DWS uses the following criteria to determine whether customers are "otherwise employable" and to establish the necessity of treatment or therapy.

Evidence received should answer the following:

1. Is the customer able to participate at least 30 hours a week based on the medical evidence provided?
2. If yes, the customer can be placed in one of the following services if appropriate:
 - a) Mental Health Treatment-Job Readiness
 - b) Physical Treatment-Job Readiness
 - c) Substance Abuse Treatment-Job Readiness
3. If no, place the customer in other appropriate services as negotiated in the employment plan.

Describe the certification requirements for qualified medical or mental health professionals used in this process.

A qualified medical or mental health professional is defined as a State licensed provider of medical or mental health services. DWS will accept a statement from our in-house mental health professional, a medical statement, report, or a DWS Form 1 as acceptable medical evidence. The medical or mental health provider is required to complete and sign any of the above listed forms indicating the type, duration, and frequency of the treatment required. The evidence should be signed by one of the following: Medical Doctor (MD), Doctor of Osteopathy (DO), Advance Practice Registered Nurse (APRN), Physician's Assistant PA and Licensed Mental Health Therapist, including a psychologist, Licensed Clinical Social Worker, Certified Social Worker, Marriage & Family Therapist, and Professional Counselor.

Describe how the State ensures that no more than six weeks (four consecutive weeks) of job search and job readiness assistance are reported in a fiscal year (or a total of 12 weeks in States that meet the definition of a "needy State" for the Contingency Fund).

To make certain that no more than six total weeks, and four consecutive weeks, of job search and job readiness assistance are reported in a fiscal year, a table in our data warehouse will track weeks in which verified hours of participation are reported for each FEP customer beginning the first Sunday of the October reporting cycle and continuing through the last Saturday in the September reporting cycle. A week starts on Sunday and ends on Saturday. If a FEP customer has any verified hours of participation for job search and job readiness assistance, and has not already met participation in other countable activities during that seven-day period, a count of one week is added to the table for that customer. This continues for each week in the fiscal year. If the customer meets participation in other countable activities during that seven-day period, without including the verified hours for Job Search and Job Readiness, the hours will not be reported and will not be counted as one of the six weeks.

The table in the data warehouse also calculates if and when each customer has used four consecutive weeks. If the customer has verified hours of participation for job search and job readiness assistance during the fifth consecutive week, those hours are not included in the total number of hours reported quarterly. Two additional weeks of verified participation hours may be included in the total hours reported quarterly after the break for the 5th consecutive week. Once the customer has six counted weeks of verified participation in job search and job readiness activities, any additional verified hours are not included in the total number of hours reported quarterly.

Vocational Educational Training

Describe the services or programs the State includes under the activity.

Occupational Skills Training – Employment related education that provides customers specific occupational skills that support employment in entry-level, semi-skilled, or skilled jobs. This service includes but is not limited to: short-term, certificate programs such as Certified Nursing Assistance, CPR, Commercial Driver's License, etc.

Apprenticeship Training – Classroom training leading to skilled labor and eventual employment for customers who want to learn a trade. Programs must meet the apprenticeship criteria established by the Bureau of Apprenticeship and Training.

Associate's Degree – An educational activity related to the pursuit of a two-year post high school degree. Training should be limited to activities that give individuals the knowledge and skills to perform a specific occupation.

Youth Occupational Skills Training – Employment related education provided with the expectation of customers obtaining specific occupational skills sufficient to become employed in entry level, semi-skilled, or skilled jobs. This service includes short term and certificate programs such as CNA, CPR, lifesaving, etc. Customers must be enrolled in WIA.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet daily supervision and verification requirements.

Vocational Education training occurs at private or public educational institutions or training facilities including, but not limited to: career and technical education schools, vocational centers, community colleges, and universities.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours spent in each Vocational Education activity, including supervised study time, and transportation hours (based on formula described above) in a reporting cycle. Excused hours and holiday hours may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: School attendance records, collateral contact, and other forms provided by DWS.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by staff at the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors.

Describe how the State ensures participation in vocational educational training does not count

beyond the statutory limitations limiting participation to 12 months lifetime per individual.

To ensure that no more than 12 months of vocational education training count beyond the statutory limitations of 12 months per lifetime of the customer, a column in a table in the data warehouse keeps track of the reporting cycles in which hours of participation have been reported for each FEP customer beginning October 1, 1999, and continuing through September 30, 2006.

Beginning October 1, 2006, each FEP customer's record is reviewed to determine if there are any verified hours of participation for vocational education training during a reporting cycle. If a FEP customer has any verified hours of participation for vocational education training during that period, a count of one month is added to the table for that customer. This continues for each reporting cycle in the fiscal year. Any additional hours of verified participation in vocational education training beyond the first 12 reporting cycles are included in the total number of hours reported for Jobs Skills Training or Education Directly Related to Employment. If a FEP customer meets participation during a reporting cycle without adding the vocational education training hours, they will not be reported and will not be counted in the 12 months lifetime limit.

Explain how the State will ensure that basic and remedial education and English as a Second Language (ESL), if such activities are counted, are of limited duration and a necessary or regular part of the vocational education training.

DWS does not allow English as a Second Language (ESL) under vocational education training. Basic and remedial education is only allowed if the educational institution includes it in the course curriculum. Basic and remedial education is a separate service in UWORKS. Employment Counselors are instructed to use this service for customers who are not pursuing a vocational educational training program. DWS requests copies of course curriculum from customers to ensure that basic and remedial education are of limited duration and a necessary part of the vocational education training.

Job Skills Training Directly Related to Employment

Describe the services or programs the State includes under the activity.

Second year of vocational education activities including: Occupational Skills Training, Apprenticeship Training, Associate's Degree and Youth Occupational Skills Training. DWS policy requires educational activities to be related to employment. The overall purpose of providing customers training is to help customers increase occupational skills in order to obtain, maintain, and enhance employment that will lead to the customers' ability to support themselves and their families.

English as a Second Language – Enrolled in English as a Second Language educational service. This activity must be directly related to employment for customers.

Basic Skills Remediation – Training that may include adult education, literacy activities,

remedial reading, writing, mathematics, or a combination thereof; for customers who have proficiencies below the ninth grade level. This service may also be used to improve basic skills to a level greater than customers held at assessment. This activity must be directly related to employment for customers.

Bachelor's Degree – Enrolled in educational program activities related to the pursuit of a four-year post high school degree. This activity must be directly related to employment for customers.

Youth Occupational Skills Training – Bachelor's – Training in educational program activities related to the pursuit of a four-year post high school degree. This activity must be directly related to employment for customers. Customer must be enrolled in WIA.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet daily supervision and verification requirements.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours spent in each Job Skills activity, including supervised study time, and transportation hours (based on formula described above) in a reporting cycle. Excused hours and holiday hours may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: School attendance records, collateral contact, and other forms provided by DWS.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by staff at the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors.

Education Directly Related to Employment

Describe the services or programs the State includes under the activity.

Basic Skills Remediation – Training that may include adult education, literacy activities, remedial reading, writing, mathematics, or a combination thereof; for customers who have proficiencies below the Ninth grade level or to improve basic skills to a level greater than customers held at assessment. This activity must be directly related to employment for customers.

English as a Second Language – English as Second Language educational services. This activity must be directly related to employment for customers.

Second year of occupational skills training – Employment related education that provides customers specific occupational skills that support employment in entry-level, semi-skilled, or skilled jobs. This service includes but is not limited to: short-term, certificate programs such as Certified Nursing Assistance, CPR, Commercial Driver's License, etc.

GED/HS Diploma – Courses leading to a General Education Diploma (GED) or High School Diploma (HS). This service can also include other related education activities such as basic skills remediation or ESL if it's part of the GED/HS program.

Courses completed in an on-line learning environment only count as a work activity under this definition if the course can meet daily supervision and verification requirements.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours spent in each education directly related to employment activity, including supervised study time, and transportation hours (based on formula described above) in a reporting cycle. Excused hours and holiday hours may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: School attendance records, collateral contact and other forms provided by DWS.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by staff at the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors.

Describe the State's criteria for "good or satisfactory progress" and when and how it is documented.

DWS has established criteria for good or satisfactory progress; it includes monitoring frequently enough to ensure that customers are pursuing the activities that have been agreed upon and progressing according to the established plan. The monitoring of education/training progress should address both qualitative (grades and proficiency) and quantitative (length of time established to complete the activity) progress. Employment

Counselors are instructed to narrate monitoring results in the electronic case record.

Satisfactory School Attendance

Describe the services or programs the State includes under the activity.

Alternative School – Specialized, structured curriculum offered inside or outside the public school system, which may provide work/study and/or assist youth with obtaining a HS diploma or GED. This includes basic skills improvement activities for out-of-school youth, including youth enrolled in post-secondary education that need assistance to pass classes, improve grades, or generally improve academic skills. Must be enrolled in WIA.

GED/HS Diploma – Enrolled in GED and HS Diploma. This service can also include other related education activities such as basic skills remediation or ESL if it's part of the GED/HS program.

Youth Tutoring/Dropout Prevention – Coaching, teaching and guiding customers to increase academic success potential. This includes study skills, dropout prevention strategies and instruction leading to secondary school completion. This service also applies to assisting youth with basic skills improvement (remediation), and obtaining a HS diploma or GED.

Describe how the State determines the number of countable hours of participation for the activity. If the State uses different methods for different services or programs within the activity, the State should describe each.

The number of countable hours of participation is determined by adding the number of hours in each Satisfactory School Attendance activity, including supervised study time, and transportation hours (based on formula described above) in a reporting cycle. Excused hours and holiday hours may also be added.

Describe how the State verifies the actual hours of participation for the activity. Include the procedures for obtaining and maintaining documentation of hours of participation.

Customers are instructed to provide documentation every two weeks. Verified participation hours are entered on the verification screens in UWORKS. Documentation is maintained in the electronic case file. Examples of acceptable documentation include: School attendance records, collateral contact, and other forms provided by DWS.

Describe the methods of daily supervision for each unpaid work activity.

Supervision will be provided by staff at the education institution, including: faculty, instructors, instructional aids, lab supervisors, and study hall supervisors.

Describe the State's criteria for "good or satisfactory progress" and when and how it is documented.

DWS has established criteria for good or satisfactory progress; it includes monitoring

frequently enough to ensure that customers are pursuing the activities that have been agreed upon and progressing according to the established plan. The monitoring of education/training progress should address both qualitative (grades and proficiency) and quantitative (length of time established to complete the activity) progress. Employment Counselors are instructed to narrate monitoring results in the electronic case record.

Providing Child Care Services to an Individual Participating in a Community Service Program

Describe the services or programs the State includes under the activity.

DWS does not currently offer this service to FEP customers.

II. Hours Engaged in Work

Excused Absences and Holidays

Describe the State's excused absence policies for unpaid work activities. This includes its policies for holidays as well as the ten additional excused absences that the State may count in a 12 month period. If the policies vary by work activity, the State should describe how they vary and for which activities. Plans must specify the holidays being excused – and also explain how State's track excused absences in their system.

DWS policy will recognize all State and Federal holidays as excused hours of participation including: New Year's Day, Martin Luther King Jr. Day, President's Day, Memorial Day, Independence Day, Pioneer Day, Labor Day, Columbus Day, Veteran's Day, Thanksgiving, Christmas Eve Day, Christmas Day. One personal day is allowed as a holiday each Federal fiscal year. Days when the parent cannot perform activities due to the scheduled holiday closure of a service provider will also be included, but will not exceed two-weeks per occurrence. For example, some service providers are not open the day after Thanksgiving, or when education facilities are closed for breaks between courses or semesters. Customers must be scheduled to participate on the holiday for the hours to count towards participation.

No more than 2 days per reporting cycle of excused absences are allowed to count as participation and no more than 10 days a year (12 reporting cycles) of excused absences are allowed to count towards participation in any twelve month period. Customers must be scheduled to participate during the excused time for the hours to count towards participation.

Customers may be granted additional excused absences at the discretion of Employment Counselors based on the facts and circumstances surrounding the customer's situation. However, additional excused absences will not count toward participation.

Excused absences are entered into the UWORKS verification pop up (explained above) by Employment Counselors. Once countable participation hours are entered, UWORKS calculates whether the excused hours will be used for Federal reporting. If the excused days, added together with the hours customers are participating in countable activities,

total what is needed for customers to meet participation, those hours will be included in the Federal report.

There are two instances in which excused hours will not be included in the federal report:

1. If the excused hours, added together with the hours the customer is participating in countable activities, do NOT total what is needed for the customer to meet participation.
2. If the hours the customer is participating in countable activities total what is needed to meet participation without the excused hours being included.

DWS' data warehouse will track the number of excused days used for each reporting cycle and for the previous twelve reporting cycles. Excused hours reported on the verification pop-up screen will be converted to days based on a six-hour day. Any excused hours included in the Federal report between one and six will count as one excused day. If the excused hours included in the federal report total seven to twelve, this will count as two excused days. Any hours above twelve during a reporting cycle will not count toward participation.

FLSA Deeming

If the State wishes to use the "deeming" provision permitted at §§ 261.31 and 263.32 for work experience or community service programs, describe how the State determines the work hours requirement, including how the monthly TANF grant and food stamp allotment combined and divided by the appropriate minimum wage to meet the "core" participation requirement. Include a statement certifying that the State has adopted a mini Simplified Food Stamp Program in order to count the value of food stamp benefits.

To determine the maximum number of hours a customer may participate in a Community Service Internship, UWORKS will look at the previous month's TANF and food stamp benefit amounts. The monthly grant amounts will be added together then divided by the Federal minimum wage and divided again by 4.3 to determine a weekly amount. When the Community Service Internship service is added to the employment plan, the "hours" field will automatically populate with the maximum number of hours as determined by the previous month's benefits. Employment Counselors may assign fewer hours but may not go above the maximum number as determined in the calculation.

Each month, the system will determine whether there have been changes to TANF and food stamp benefit amounts. If benefit amounts have changed, the system will calculate the maximum number of hours a customer may participate in a Community Service Internship the following month using the procedure described above. A UWORKS task will be sent to Employment Counselors notifying them of the change in hours. Employment Counselors have until the first of the following reporting cycle to negotiate the change with the community service site supervisor and customer. The hours will then be changed on the employment plan as negotiated with customer. A table will be maintained behind the scenes to store the monthly calculation of hours on deemed cases and will be used to determine hours that may be deemed.

Utah will implement a Mini-Simplified Food Stamp Program, which allows it to match its food stamp exemptions to those of its TANF program. This will be implemented on May 1, 2007.

Work Eligible Individual

Describe the State's procedures for identifying all work eligible individuals, as defined at §261.2. This should include the procedures needed to identify a non-recipient parent excluded from the definition of work-eligible individual.

The PACMIS eligibility computer system identifies whether an adult on the TANF case is part of a family receiving assistance.

1. If the adult on the TANF case is coded as "IN" for eligibility, this means they are required to participate. As long as these adults are not sanctioned for the reporting month, they will be coded as an adult receiving assistance and a work-eligible individual. If there are two adults on the TANF case, and one adult is incapacitated for more than 30 days, they will both be coded as a work-eligible individual, but additional coding in PACMIS will tell us about the incapacity. DWS will exclude the incapacitated adult from the participation requirement in the Work Participation Code column.
2. If the adult on the TANF case is coded as "IN" for eligibility, this means they are required to participate. If the service of "Adult Caring for Disabled Family Member" is opened on the employment plan during a reporting cycle, the adult will be coded as a parent caring for a disabled family member in the home and not a work-eligible individual.
3. If the adult on the TANF case is coded as "IN" for eligibility, this means they are required to participate. If these adults are sanctioned for the reporting month, they will be coded as a work-eligible individual and a non-recipient parent due to a sanction.
4. DWS closes an entire case that has received benefits for 36 months unless they are eligible for an extension. Therefore, customers are never considered non-recipient parents due to a time limit.
5. If the adult on the TANF case is coded "SS," this means the adult is receiving Social Security Disability. DWS will code this individual as a work-eligible individual who is a non-recipient parent receiving SSI if the individual is participating in core activities and meets participation.
6. If the adult on the TANF case is coded as "DF," this means the adult is required to participate even though he/she has been disqualified for fraud. These adults will be coded as a work-eligible individual who are non-recipient parents due to other reasons.
7. If the adult is coded as "DP" (the earnings of the adult are used to determine

eligibility but the adult is not included in the grant) and is not participating in core activities with enough hours to meet participation, these adults will be coded as a work-eligible individual who are non-recipient parents due to other reasons. These parents will be excluded from the participation requirement in the Work Participation Code column.

8. If the adult is coded “SS” (adult receiving Social Security Disability), and is not participating in core activities with enough hours to meet participation, DWS will check the minor children receiving assistance to determine:
 - a. If the minor children are grandchildren, niece/nephew, cousin, sister or brother, stepsister/brother, or not related but the adult has legal custody, the adult will be coded as a non-work-eligible individual who is a non-recipient, but not a parent.
 - b. If the minor children are coded as a child, stepchild, or unborn child, the adult will be coded as a non-work-eligible individual who is a non-recipient parent receiving SSI.
9. If the adult is coded “OU” (not included in the TANF benefit), DWS programming will check the minor children receiving assistance to determine whether the minor children are grandchildren, niece/nephew, cousin, sister or brother, stepsister/brother, or not related but the adult has legal custody. The adult will be coded as a non-work-eligible individual who is a non-recipient, but not a parent.
10. If the adult on the TANF case is coded as an Ineligible Alien (part of the household but not included in the TANF benefit), these adults will be coded as an ineligible alien due to immigration status and not a work-eligible individual.
11. By checking the date of birth and participation code in relation to the head of household, we can determine if there is a minor parent who is not a head-of-household on the TANF case. This person will not be coded as a work-eligible individual.

Describe the procedures for identifying a parent caring for a disabled family member, who may also be excluded from the definition of a work-eligible individual.

DWS is opting to exclude parents caring for a disabled family member who is not in school full time, from the definition of a work-eligible individual. DWS will use the following definitions to determine whether a parent meets these criteria:

A Disabled Family Member is defined as a family member who is incapable of providing for themselves and who requires a parent in the home to meet their daily needs. This family member must live in the household but is not necessarily included in the financial case. Disabled family members can include: Natural, step, or adoptive children, current spouse, other parent of the dependent child(ren) in the household, natural, step, or adoptive parent, relatives including those prefixed with great, great, great and great, great, great though blood, marriage, adoption, step-relations, grandparent, aunt or uncle,

brother or sister, niece or nephew, or spouse of anyone listed above even after the marriage is terminated by death, separation, or divorce.

Attending school full-time: Full-time education or training means education or training attended on a full-time basis as defined by the school.

The need for a parent to remain in the home to care for a disabled family member will be documented via a written statement from a medical doctor, a doctor of osteopathy, a licensed Mental Health Therapist as defined in UCA 58-60-102, a Licensed Clinical Social Worker, Certified Social Worker, Marriage & Family Therapist, Professional Counselor, licensed Advanced Practice Registered Nurse, or a licensed Physicians Assistant (unless the dependent is on the Travis C Medicaid waiver program). The written statement must be based on a current physical examination of the person, not just a review of the person's medical records and must include: the diagnosis of the family member's condition, the recommended treatment needed or being received for the condition, the length of time the parent will be required in the home to care for the family member, and whether the parent is required to be in the home full-time or part-time. The need for the parent to remain in the home must be at least 30 days or longer.

For permanent or temporary disability, medical evidence must be provided to Employment Counselors no less than every six months, or at the time the medical evidence documents that the family member is no longer disabled or starts attending full time school.

If it is determined that a parent meets the definition above, an Employment Counselor will open the "Adult Caring for a Disabled Family Member" service in UWORKS so the parent can be identified.

Describe verification procedures for ensuring the accuracy in reporting of work-eligible individuals on the TANF Data Report and the SSP-MOE Data Report, including:

When DWS codes the Work Participation Status of all adults on TANF, the following programming routines are performed in the order listed:

1. If the sum of verified participation hours in:
 - a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training equal to or greater than 30, THEN
 - b. The Work Participation Status field is coded 19 (meeting participation requirements).
2. If the sum of verified participation hours in:
 - a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training equal to or

- greater than 20 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory School bring the total verified participation hours to 30 or more, THEN
 - c. The Work Participation Status field is coded 19 (meeting participation requirements).
3. If the type of family is coded as a “3” (family excluded from both the overall and two-parent work participation rates because all adults are coded Ineligible Alien, Out (household member not included in TANF benefit), or receiving Social Security Income; the work participation status is coded as a “99” (the adult(s) are not part of the eligible family receiving assistance but they are living in the household).
 4. If the service of Adult Caring for Disabled Family Member is opened on the employment plan at any time during the reporting cycle, the work participation status is coded as a “99” (the adult(s) are not part of the eligible family receiving assistance but they are living in the household).
 5. If there is:
 - a. Only one adult in the TANF family, AND
 - b. The children on the TANF case are either daughter or son, stepdaughter or stepson, AND
 - c. The age of the youngest child is calculated based on his/her verified birth date to be less than 6 years old for the reporting cycle, AND
 - d. The sum of verified participation hours in unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training equal to or greater than 20 and less than 30, THEN
 - e. The Work Participation Status field is coded 17 (Deemed engaged in work – parent or relative (who is the only parent or caretaker relative in the family) with child under age 6 and parent engaged in work activities for at least 20 hours per week).
 6. If the adult on the TANF case:
 - a. Is calculated to be less than age 20 based on their verified birth date, AND
 - b. The adult does not have a High School Diploma or GED, AND
 - c. The verified participation hours in Satisfactory School greater than 0, THEN
 - d. The Work Participation Status field is coded 15 (Deemed engaged in work – single teen head-of-household or married teen who maintains satisfactory school attendance).
 7. If there is only one adult in the TANF family:
 - a. The adult on the TANF case is calculated to be less than age 20 based on their verified birth date, AND
 - b. The adult does not have a High School Diploma or GED, AND
 - c. The verified participation hours in Education Related to Employment for Individuals

- without a High School Diploma or GED equal to or greater than 20, THEN
- d. The Work Participation Status field is coded 16 (Deemed engaged in work – single teen head-of-household or married teen who maintains satisfactory school attendance).
8. If there is only one adult in the TANF family:
 - a. The age of the youngest child is calculated based on his/her verified birth date to be less than 1 for the reporting cycle, AND
 - b. This adult has not been disregarded from the participation rate for more than 12 months beginning October 2006, THEN
 - c. The Work Participation Status field is coded 1 (Disregarded from participation rate, single custodial parent with child under 12 months).
 9. If:
 - a. The family affiliation for the adult is coded a 1 (he/she is a member of the eligible family receiving assistance), AND
 - b. The adult is receiving federal disability that is NOT SSI, THEN
 - c. The Work Participation Status field is coded 7 (Exempt, disabled).
 10. If:
 - a. The family affiliation for the adult is coded a 2, 3, or 4 (he/she is not in the eligible family receiving assistance, but in the household), AND
 - b. The adult is receiving SSI, THEN
 - c. The Work Participation Status field is coded 7 (Exempt, disabled).
 11. If the TANF customer:
 - a. Has the service of Nonparticipation opened on the employment plan during a reporting cycle for the 1st sanction AND for each subsequent reporting cycle until that service is closed with the outcome of “Resolved” or “Did Not Complete” OR
 - b. Has the TANF program enrollment closed for Nonparticipation on the employment plan for the 2nd and subsequent periods of Nonparticipation, AND
 - c. The adult is required to participate, AND
 - d. The adult has not met the above criteria for more than 3 reporting cycles within the preceding 12 reporting cycles, THEN
 - e. The Work Participation Status field is coded 2 (disregarded from participation because required to participate, but not participating; and subject to sanction for the reporting month, but not subject to sanction for more than 3 months within the preceding 12-month period).
 12. If the sum of verified participation hours in:
 - a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training are greater than 0 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory

- School equal to 0, THEN
- c. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).
13. If the sum of verified participation hours in:
- a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training are less than 20, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED greater than 0, THEN
 - c. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).
14. If the sum of verified participation hours in:
- a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training greater than 20 and less than 30, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED doesn't bring the total to 30, THEN
 - c. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).
15. If the sum of verified participation hours in:
- a. Unsubsidized employment, subsidized private-sector employment, subsidized public-sector employment, work experience, on-the-job training, job search, community service programs, and vocational education training greater than 0 and less than 20, AND
 - b. The sum of verified participation hours in Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED greater than 0, THEN
 - c. The Work Participation Status field is coded 18 (participating but not meeting required participation levels).
16. If the TANF customer:
- a. Has the service of Nonparticipation opened on the employment plan during a reporting cycle for the 1st sanction AND each subsequent reporting cycle until that service is closed with the outcome of "Resolved" or "Did Not Complete" OR
 - b. Has the TANF program enrollment closed for Nonparticipation on the employment plan for the 2nd and subsequent periods of Nonparticipation, AND
 - c. The adult is required to participate, AND
 - d. The total number of reporting cycles in which the adult has met the above criteria is more than 3 reporting cycles within the preceding 12 reporting cycles, THEN
 - e. The Work Participation Status field is coded 12 (required to participate, but not

participating; and subject to sanction for the reporting month, and subject to sanction for more than 3 months within the preceding 12-month period).

17. If the sum of verified participation hours in:

- a. Employment, work experience, on-the-job training, job search, and vocational education training, Job Skills Training, Education Related to Employment for Individuals without a High School Diploma or GED, or Satisfactory School equal to 0, THEN
- b. The Work Participation Status field is coded 14 (not participating).

Describe how the State ensures that, for all work-eligible individuals, it accurately inputs data into the automated data processing system; properly tracks the hours; and accurately reports countable hours to HHS that do not include participation activities that do not meet a federal definition.

All programming for reporting goes through a code review process where one programmer reviews the programming statements for accuracy. All programming output data is reviewed and tested exhaustively prior to being used for reporting purposes.

Describe the internal controls designed to ensure established work verification procedures are properly being employed.

DWS has several internal controls it will use to ensure established work verification procedures are properly being employed.

UWORKS System Controls

UWORKS is programmed to coincide with the reporting cycles previously defined. Within each reporting cycle, two-week verification periods have been defined to assist Employment Counselors with gathering verification documents. Some two-week periods cross over two reporting cycles. Verification screens will freeze a week and a half after the two-week block that includes a week in the previous reporting cycle. Once the screens freeze, Employment Counselors will not be allowed to add new verified hour entries. Employment Counselors may request the hours be changed after the freeze date if we receive documentation from customers after the data has been frozen. The request is made through the TANF Program Specialist.

To ensure that Employment Counselors are reporting the start date of activities appropriately, an actual start date has been added to the employment plan. The actual start date may be backdated however, the date may not predate a day for which data has already been frozen and may not precede the employment plan start date. The actual start date cannot be postdated. Services that do not have an actual start date will not appear on the verification popup and cannot be verified.

A service may be added to the employment plan without an actual start date entered, however, Employment Counselors will receive system generated tasks if an actual start

date has not been entered at ten, twenty and thirty days after the service has been added to the plan. This will notify Employment Counselors that an actual start date has not been entered on the employment plan.

To ensure that Employment Counselors are entering verified hours in the UWORKS system, tasks will be sent to the Supervisor on the Friday prior to the verification due date notifying them that the Employment Counselor has not entered verified hours.

For any hours entered with a decimal amount UWORKS will round up to make sure that the calculation is done consistently.

Policy Development and Training

DWS has written policies and procedures relating to supervision, documentation and verification. All policies are located in DWS Employment and Business Services Manual (EBSM). The EBSM is available on the Web and is regularly updated and maintained. DWS staffs are informed when policy changes have been made to the manual.

DWS training is provided to new and incumbent staff. New employees receive training designed to teach new employees the basics they need to start working with customers. Most courses are designed to teach policy, procedures, philosophy and practical application, while incorporating use of the computer system in the learning process. More advanced courses on specific programs are available to ensure more comprehensive understanding. These courses also focus on relevant policy, procedure, philosophy and practical application.

“Just-in-Time” training is designed and developed to train/support a new program or concept. Generally, these training sessions are delivered in a “Train the Trainer” setting, where experts/specialists from the various areas of the state are trained. They, in turn, are expected to train employees in their local offices, often with the assistance of state program specialists. Just-in-Time concepts are then incorporated into regular training curriculum, where appropriate, to ensure employees receive training on these changes as part of their new employee training. DWS provided TANF Reauthorization Just-in-Time training in September 2006.

Describe the internal controls for data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.

There are several processes in place to help detect and correct data errors, including transcription and coding errors, data omissions, computational errors, and compilation errors.

1. UWORKS contains employment plans for every customer including the services and hours the customer has agreed to participate in. UWORKS also contains all verified hours and our imaging system, Content Manager, maintains hard copy documentation for every customer.

2. The verification screen in UWORKS shows the total hours verified for each week for each service. The verification screen shows expected and verified hours of participation. Employment Counselors and Supervisors may use these fields to ensure hours and activities are appropriate.
3. DWS also generates participation reports from its data warehouse. One lists each customer's services that were open the previous reporting cycle, the number of hours the customer has agreed to participate in each service, and the actual verified hours. Both Employment Counselors and Supervisors can review the report for discrepancies.
4. Prior to transmitting data for the quarterly reports, the total hours of participation that are going to be reported on each TANF customer are added together. For any case where the total hours of participation are 60 or more hours, each case is reviewed individually for:
 - a. The actual date the customer started participating in each service.
 - b. The hours entered on the verification screen compared to the documentation used to verify those hours.
 - c. The tasks listed under each service to see what the customer agreed to do.
 - d. The narrations in UWORKS written by Employment Counselors.
 - e. Earnings entered in PACMIS (if the service is employment-related).
 - f. Changes may be made to the data prior to transmitting depending on the information contained in a, b, c, d, and e above.
 - g. We also calculate the following:
 1. The average weekly hours of participation for each work activity for the reporting cycle to make certain the programming is calculating the participation hours correctly.
 2. The number of weeks the customer has had Job Search and Job Readiness services open during the fiscal year to make certain the programming is calculating the participation hours correctly and are appropriately reported.
 3. The number of months the customer has had Vocational Education Training services open since October 1999 to make certain the programming is calculating the participation hours correctly and the hours are appropriately reported.
 4. Any excused hours to make certain the customer has not used more than 2 days per reporting cycle or 10 days during the previous year, that the programming is calculating the participation hours correctly, and they are appropriately reported.
 5. Any holidays to make certain the programming is calculating the participation hours correctly, and they are appropriately reported.

Describe the checks to isolate electronic systems and programming errors and the steps to ensure that all work participation report items are internally consistent.

UWORKS programming goes through a code review process where one programmer reviews the programming statements for accuracy. All UWORKS output data is

reviewed and tested prior to being released in the production system.

Describe any sampling and estimation techniques employed in data validation. Document the soundness of all statistical procedures utilized.

An independent audit group from DWS, Operations Support Division will conduct an annual review of TANF cases. The focus of the review will be to ensure correct enrollment in Federal activities and to provide integrity in the process of documenting and verifying participation hours.

A random sample will be pulled without intentional bias to include or exclude items in the population. A cross-section review indicates compliance and outlines the steps that must be taken to improve performance. Although not statistically valid, the sample size will be representative of the TANF universe.

The review criteria will be developed based on interim final rules and DWS' policies and procedures related to documenting and verifying TANF participation hours. DWS is aware that criteria may need to be adjusted prior to each annual review to reflect any additional criteria or elements that have been identified as vulnerable to mistakes.

Beginning criteria for the case review will include, appropriate use of Federal definitions when enrolling customer in services, worker compliance with DWS' policy and procedures, completeness of information in UWORKS, and accuracy of participation documentation and verification.

A standard tool will be created prior to the annual review to provide consistency in the review process, and to document the findings of each case reviewed. The results of the review will be maintained in a database to provide statistical analysis capabilities.

A written report of results, trends, and data analysis will be compiled upon completion of the review and submitted to the TANF program team to ensure any issues identified will be reviewed and appropriate actions taken. All pertinent findings will be maintained for future analysis and tracking purposes.

The initial review will be completed prior to October 2007. Any enhancements to the review process will be addressed to ensure integrity and consistency in this ongoing review process.

V. Verification of Other Data Used in Calculating the Work Participation Rate

Describe the State's data validation procedures to ensure complete and accurate data reporting. Describe any procedures employed to eliminate data inconsistencies between two or more data elements for each element.

For each of the following data elements, DWS programming gathers information from our eligibility computer system, Public Assistance Case Management Information System (PACMIS). DWS' procedures to ensure complete and accurate data reporting include:

- a. Reporting Month – Every FEP customer that received a benefit for the reporting cycle is included. If the customer is a new applicant, we will include them in the reporting cycle in which they are issued a benefit.
- b. Stratum – DWS reports on the entire population and does not use stratum.
- c. Case Number – Every FEP customer has a unique case number auto assigned by PACMIS. The case number can be from three to six digits.
- d. Disposition – Because we make certain that every FEP customer received a benefit for the reporting cycle, we do not have any that should be listed in error.
- e. Type of Family for Work Participation – Since this is such a crucial data element that impacts several other data elements, we use the following comprehensive process to make certain this is coded correctly.
 1. If all of the adults on the FEP case are coded as “IN,” which means they are required to participate, the case is coded a 1 (family included in overall work participation rate).
 2. If all of the adults on the FEP case are coded Out, Ineligible Alien, or receiving Social Security Disability, the case is coded a 3 (family excluded from both the overall and two-parent work participation rates).
 3. If one of the adults on the FEP case is coded as “IN,” but a second adult on the FEP case is coded Out, Ineligible Alien, or receiving Social Security Disability, the case is coded a 1 (family included in overall work participation rate).
- f. Amount of Food Stamps Assistance - When calculating the amount of food stamps received by the TANF family, the PACMIS system will be reviewed to see if there are any Food Stamp household members who are excluded from the TANF household.
 If there are additional family members included in the Food Stamp household who are excluded from the TANF household, the amount of food stamps will be prorated equally among each food stamp recipient then the amounts added together for each of the TANF recipients. If there are no additional family members included in the food stamp household, the amount of food stamps received by the TANF family will be reported.
- g. Receives Subsidized Child Care - Eligibility workers authorize subsidized child care through our PACMIS system.
 1. If child care is authorized for a reporting cycle, this data element is coded a 1 (yes, receives child care funded entirely or in part with Federal funds).
 2. If child care is not authorized for a reporting cycle, this data element is coded a 3 (no subsidized child care received).
- h. Amounts of TANF (and SSP-MOE) Assistance
 1. For TANF assistance, this data element includes the amount of the TANF benefit received for the reporting cycle AND the amount (if any) paid for emergencies such as car repairs, clothing, general incidental expenses, bus tokens, etc.) If the TANF adult is participating in training or worksite learning, it will also include the amount provided for child care.
- i. Family Affiliation Code - This data element is determined for each person on the

TANF case.

1. If the adult on the FEP case is coded as “IN,” which means he is required to participate, the adult is coded a 1 (member of the eligible family receiving assistance).
 2. If the adult on the FEP case is coded Disqualified for Fraud or Ineligible Alien, the adult is coded a 2 (parent of minor child in the eligible family receiving assistance).
 3. If the adult on the FEP case is coded Out or receiving Social Security Disability, the adult is coded a 3 (caretaker relative of minor child in the eligible family receiving assistance).
 4. A check is made to determine if any children under the age of 19 on the FEP case are coded Out, Ineligible Alien, or receiving Social Security Disability. If true, the child will be coded a 4 (minor sibling of child in the eligible family receiving assistance).
- j. Non-Custodial Parent Indicator - This data element is not captured in PACMIS. Because a new computer system (eREP) will be in production in 2008, and will capture this data element, no attempt has been made to add this data element into PACMIS.
- k. Date of Birth (Adult)
1. This is verified through a Social Security interface.
 2. If the FEP applicant is an alien, the date of birth is taken from the Alien Certification card. The Alien number is verified through the System for Alien Verification (SAVE).
- l. Relationship to Head-of-Household
1. If the adult on the FEP case is the head of household, that individual is coded a 1 (head-of-household).
 2. If the adult on the FEP case is the spouse of the head of household, that individual is coded a 2 (spouse).
 3. If the parent of the head of household is on the FEP case, that individual is coded a 3 (parent).
 4. The children of the head of household are coded a 4 (daughter or son).
 5. The stepchildren of the head of household are coded a 5 (stepdaughter or stepson).
 6. The grandchild or great grandchild of the head of household is coded a 6.
 7. The brother, sister, nephew, niece, or cousin of the head of household is coded a 7.
 8. The foster child of the head of household is coded an 8.
 9. A child not related to the head of household is coded a 9.
 10. An adult not related to the head of household is coded a 10.
- m. Parent with Minor Child
1. To be eligible for TANF, the household must have at least one child under the age of 19 living in the home. A natural parent, adoptive parent, or step-parent on a FEP case will be coded a 2 (yes, a parent with a minor child in the family, but not used in two-parent participation rate).
- n. Work-Eligible Individual Indicator - PACMIS identifies whether an adult on the TANF case is part of the family receiving assistance.

o. Date of Birth (Child)

1. This is verified through a Social Security interface.
2. If the FEP applicant is an alien, the date of birth is taken from the Alien Certification card. The Alien number is verified through the System for Alien Verification (SAVE).

Work Participation Status

Describe the State's procedures to ensure that a family is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single custodial parent with a child less than one year of age.

DWS ensures that an adult is not disregarded from the work participation rate for more than 12 months per lifetime based on being a single-custodial parent with a child less than one year of age by keeping track of each month the adult is disregarded in a table in a data warehouse. DWS has not used this category to exclude customers from the participation rate in the past but plans to do so effective October 1, 2006. We will also check to make certain that the adult is a single-custodial parent and that the child is less than one year of age based on the child's birth date as of the reporting cycle. If the child's birth date is during the reporting cycle, the adult is no longer eligible to be disregarded from the participation rate.

Describe procedures to ensure that a family is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work.

DWS ensures that an adult is not disregarded from the work participation rate for more than three months in any period of 12 consecutive months based on a work-eligible individual's refusal to participate in work. For each reporting cycle in the Federal report, we look back in PACMIS to the preceding 12 reporting cycles and determine the number of reporting cycles the customer has been sanctioned.

Describe the procedures for ensuring a family deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six.

DWS ensures a parent or relative who is the only parent or caretaker relative in the family is deemed engaged in work based on 20 hours of participation in countable work activities meets the requirements of a single custodial parent or caretaker relative with a child under age six. We determine that the child is less than six years of age based on the child's age as of the reporting cycle. If the child's sixth birth date is during the reporting cycle, the single teen head-of-household is no longer eligible to be deemed as participating based on 20 hours. We also determine if there is another adult in the TANF household.